

11 August 2017

Mr Paul Retter
Chief Executive Officer
National Transport Commission
Level 15/628 Bourke Street
Melbourne VIC 3000
Via NTC portal

AUSTRALIAN ROAD RULES 12TH AMENDMENT PACKAGE

Dear Paul

Gas Energy Australia (GEA) appreciates the opportunity to respond to the National Transport Commission (NTC) Australian Road Rules 12th Amendment Package, Consultation Draft, June 2017.

GEA does not support the New Rules 292A and 292B – Restricting movement of loads and load restraint systems being included in the Australian Road Rules. GEA contends that this would create confusion and uncertainty for the gaseous fuels industry which uses the Australian Code for the Transport of Dangerous Goods by Road & Rail. GEA notes that the draft load restraint guidelines, while generally referencing the Transport of Dangerous Goods, include specific references within the Light Vehicle Guide to the quantities of LPG that can be transported. The quantity referenced is different to that specified in Australian Standards and some State regulations.

Expanding load restraint regulation so that it overlaps dangerous goods regulation and blurs the delineation between the two would create confusion and uncertainty and unnecessarily increase costs for industry and ultimately consumers. For example, if rules 292A and 292B were included in the Australian Road Rules, a Department of Transport Inspector in Queensland could choose to issue an infringement under the Queensland Road Rules (Transport Operations (Road Use Management—Road Rules) Regulation 2009) which would be linked to the Load Restraint Guide for Light Vehicles that specifies 15kg maximum quantity. On the other hand, the Dangerous Goods regulation (Transport Operations (Road Use Management—Dangerous Goods) Regulation 2008) has a variety of capacities depending on the method of carriage with the lowest threshold for internal carriage within a vehicle being 50L water capacity.

GEA cannot support regulatory creep which would increase uncertainty and costs and urges the NTC in its recommendations to clearly define the scope of the load restraint regulations to prevent unnecessary overlap and duplication of the dangerous goods regulations.

GEA welcomes the opportunity to further discuss these concerns and looks forward to continuing to work with the NTC to improve road safety and productivity.

For your consideration.

Yours sincerely

A handwritten signature in black ink, appearing to read "John Griffiths", with a long horizontal line extending to the right.

John Griffiths
Chief Executive Officer
Gas Energy Australia